

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

RONDA DANNER,

Plaintiff,

v.

LEADING HEALTHCARE
SOLUTIONS, INC.,

Defendant.

Case No. 2:22-cv-11498

HONORABLE STEPHEN J. MURPHY, III

**STIPULATION AND ORDER TO EXTEND TIME
FOR DEFENDANT TO RESPOND TO SECOND AMENDED COMPLAINT**

Plaintiff Ronda Danner filed a second amended complaint against Defendant Leading Healthcare Solutions for violations of the Telephone Consumer Protection Act and the Florida Telephone Solicitation Act. ECF 44. The parties then stipulated to extend Defendant's deadline to answer or otherwise respond to the second amended complaint until September 19, 2023. ECF 45. Defendant did not answer or otherwise responded to the complaint by the agreed-upon date. Instead, the parties submitted to the Court's chambers a second stipulated order to extend time for Defendant to answer or otherwise respond to the amended complaint until September 26, 2023 because the parties are working to resolve the dispute.

The Court will enter the stipulation. But, in the interest of judicial economy, to the Court will not entertain further requests to extend the deadline for Defendant to answer or otherwise respond to the second amended complaint.

WHEREFORE, it is hereby **ORDERED** that Defendant must **ANSWER OR OTHERWISE RESPOND** to the second amended complaint **no later than September 26, 2023**. The Court will entertain no further requests to extend the deadline for Defendant to answer or otherwise respond to the second amended complaint.

SO ORDERED.

s/ Stephen J. Murphy, III
STEPHEN J. MURPHY, III
United States District Judge

Dated: September 21, 2023

STIPULATION

NOW COME Plaintiff Ronda Danner and Defendant Leading Healthcare Solutions, Inc. (hereinafter “LHS”), by and through their respective undersigned counsel of record, and agree to extend the deadline for Defendant LHS to respond to Plaintiff’s Second Amended Complaint dated August 15, 2023 (“Second Amended Complaint”), up to and including Tuesday, September 26, 2023. In support of the Stipulation, the parties state as follows:

1. On August 15, 2023, Plaintiff filed the Second Amended Complaint against Defendant LHS.

2. This Court has granted one prior 21-day extension of the response deadline, and LHS’s current deadline to respond to Plaintiff’s Second Amended Complaint is August 29, 2023.

3. During the past few days, the parties have been actively discussing potential resolution of Danner’s claims against LHS. The parties’ discussions last week and this week have been productive, but have not resulted in an agreed-upon resolution.

4. Counsel for LHS has contacted Plaintiff’s counsel and obtained his agreement to further extend LHS’s deadline to respond to the Second Amended Complaint by 7 days – or until September 26, 2023.

5. There are currently no case management deadlines set in this matter and this request is made in good faith and not for the purposes of delay.

6. Counsel for Plaintiff concurs in the extension up to and including

Tuesday, September 26, 2023, for Defendant LHS to respond to the Second Amended Complaint.

Accordingly, the parties agree that Defendant LHS shall have until **Tuesday, September 26, 2023**, to respond to Plaintiff's Amended Complaint.

SO STIPULATED:

KAUFMAN P.A.

s/ Avi R. Kaufman (by permission)

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Counsel for Plaintiff

Dated: September 19, 2023

FOLEY & LARDNER, LLP

s/ Irina N. Kashcheyeva

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Counsel for Defendant LHS

Dated: September 19, 2023